

CAMILLE M. ABATE, ESQ.
ATTORNEY AT LAW

Of Counsel, Nicholas Goodman & Associates
333 Park Avenue South, Suite 3A, New York, NY 10010
TEL: (212) 227-9003 • FAX: (212) 937-2112
c.abate71@gmail.com

September 13, 2022

VIA ECF

Honorable Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

REQUEST GRANTED.

The Sentencing hearing previously set for September 29, 2022 is rescheduled to October 19, 2022 at 12:00PM in Courtroom 15C at the 500 Pearl Street Courthouse.

9/14/2022 SO ORDERED.


LEWIS J. LIMAN
United States District Judge

**Re: Request for Adjournment of Sentence
*United States v. Julianny Ramirez, 22 Cr. 219 (LJL)***

Dear Judge Liman:

Sentence in this case is currently scheduled for September 29, 2022. For the reasons that follow, I respectfully request that sentencing be postponed until the week of October 17, 2022, on a date convenient to the Court.

On May 21, 2022, my spouse was in a near-fatal car accident that left him with eight fractures throughout his body. Despite the accident, in June I tried a bank fraud case before Judge Cote, and in July I tried a Hobbs Act robbery before Judge Berman. In August, the trauma from the car accident caused a severe staph infection in my husband's right arm, necessitating surgery on August 17, and subsequently intravenous antibiotics. I have been administering the intravenous injections of antibiotics three times a day and will do so until September 29. I am attempting to get back up to speed on my legal work, but it has been hard.

Thus, while the Presentence Report for Mr. Ramirez was filed on July 5, I have not yet been able to read it, much less go through it with my client. I am not currently ready or able to file a sentencing submission. I therefore request that the sentencing be adjourned.

I have spoken to Assistant United States Attorney Edward Robinson about this, and he consents to the postponement. Thank you for your consideration of this request.

Sincerely,


Camille M. Abate
Camille M. Abate, Esq.

cc: AUSA Edward Robinson (via ECF)